# Exhibit G

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### PRIVILEGED & CONFIDENTIAL

July 31, 2023

#### **Ad Hoc Committee of Talc Claimants**

In re LTL Management, No 21-30589 United States Bankruptcy Court for the District of New Jersey

Invoice Period: 04-04-2023 - 04-14-2023

RE: LTL Management Bankruptcy II

#### **Time Details**

Date	Professional	Task	Hours	Rate	Amount
04-04-2023	RSM	B110 - Case Administration	0.10	860.00	86.00
	Reviewed FCR's submission re dismissal order.				
04-04-2023	RSM	B110 - Case Administration	1.30	860.00	1,118.00
	Analyzed strategi	c issues re LTL's new Court filings.			
04-04-2023	RSM	B110 - Case Administration	0.70	860.00	602.00
	Correspondence	with co-counsel and committee member representatives re L	.TL's new	Court filings.	
04-05-2023	RSM	B110 - Case Administration	0.40	860.00	344.00
	Correspondence	with clients and co-counsel re strategies for dealing with LTL	's new fili	ngs.	
04-05-2023	RSM	B110 - Case Administration	0.50	860.00	430.00
	Zoom conference	with co-counsel re next steps for LTL II bankruptcy.			
04-05-2023	RSM	B110 - Case Administration	1.50	860.00	1,290.00
	Zoom conference	with clients and co-counsel re next steps and strategies for	LTL II bar	nkruptcy.	
04-05-2023	RSM	B110 - Case Administration	0.40	860.00	344.00
	Reviewed analysi	is of new LTL filings and potential arguments in opposition.			
04-05-2023	CMW	B410 - General Bankruptcy Advice / Opinions	2.00	500.00	1,000.00
	Analyzed case la	w on the ability to seek mandamus of a bankruptcy court dire	ctly at the	e circuit court	level.
04-05-2023	JSM	B110 - Case Administration	0.80	1,160.00	928.00
	Reviewing new ba	ankruptcy petition filed by LTL.			
04-05-2023	JSM	B110 - Case Administration	2.10	1,160.00	2,436.00
	Reviewing John h	Kim first-day declaration.			
04-05-2023	JSM	B110 - Case Administration	1.90	1,160.00	2,204.00
	Reviewing motion	n for stay relief filed by LTL.			
04-05-2023	JSM	B110 - Case Administration	0.40	1,160.00	464.00
	Email communica	ation with counsel to Ad Hoc committee regarding legal strate	gy.		
04-05-2023	JSM	B110 - Case Administration	1.00	1,160.00	1,160.00
	Zoom with repres	entatives on Ad Hoc committee to discuss legal strategy.			
04-05-2023	JSM	B110 - Case Administration	0.50	1,160.00	580.00
	Zoom with counse	el to Ad Hoc committee to discuss legal strategy.			
04-05-2023	JSM	B110 - Case Administration	0.60	1,160.00	696.00
	Revising legal str	ategy outline for Ad Hoc committee.			
04-05-2023	RA	B110 - Case Administration	0.40	320.00	128.00
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Date	Professional Task Exhibit G Page 3 of 8	Hours	Rate	Amount
	Execute docket searches for prior relevant cases.			
04-06-2023	KB B190 - Other Contested Matters (excluding assumption / rejection motions)	0.40	500.00	200.00
	Review bankruptcy petition plus first-day filings.			
04-06-2023	AS B140 - Relief from Stay / Adequate Protection Proceedings	2.00	595.00	1,190.00
	Review LTL filing in advance of strategy meeting.			
04-06-2023	JSM B110 - Case Administration	0.50	1,160.00	580.00
	Revising legal strategy outline for Ad Hoc committee.			
04-06-2023	JSM B110 - Case Administration	1.00	1,160.00	1,160.00
	Zoom with representatives on Ad Hoc committee to discuss legal strategy.			
04-06-2023	JSM B110 - Case Administration	0.30	1,160.00	348.00
	Email communication with Gerard Cicero of Brown Rudnick to discuss lega	ıl strategy.		
04-06-2023	JSM B110 - Case Administration	0.30	1,160.00	348.00
	Email communication with Mike Winograd of Brown Rudnick to discuss leg	al strategy.		
04-06-2023	JSM B140 - Relief from Stay / Adequate Protection Proceedings	4.60	1,160.00	5,336.00
	Drafting legal arguments to oppose LTL motion for stay relief.			
04-06-2023	RSM B110 - Case Administration	0.10	860.00	86.00
	Correspondence with clients and co-counsel re LTL's proposed settlement			
04-06-2023	JSM B110 - Case Administration	0.30	1,160.00	348.00
	Email communication with counsel to Ad Hoc committee regarding legal st	ategy.		
04-06-2023	KB B190 - Other Contested Matters (excluding assumption / rejection motions)	0.10	500.00	50.00
	Correspond with J. Massey regarding upcoming research regarding the mo	tion to dismi	SS.	
04-07-2023	JSM B110 - Case Administration	0.40	1,160.00	464.00
	Email communication with counsel to Ad Hoc committee regarding legal st	ategy.		
04-07-2023	JSM B190 - Other Contested Matters (excluding assumption / rejection motions)	0.60	1,160.00	696.00
	Zoom with counsel to Ad Hoc committee to discuss motion to dismiss.			
04-07-2023	JSM B190 - Other Contested Matters (excluding assumption / rejection motions)	5.20	1,160.00	6,032.00
	Drafting Ad Hoc committee motion to dismiss.			
04-07-2023	JSM B140 - Relief from Stay / Adequate Protection Proceedings	3.90	1,160.00	4,524.00
	Drafting opposition to LTL motion for stay relief.			
04-07-2023	AS B140 - Relief from Stay / Adequate Protection Proceedings	0.60	595.00	357.00
	Call with Brown Rudnick and Otterbourg re MTD and PI.			
04-07-2023	AS B140 - Relief from Stay / Adequate Protection Proceedings	0.10	595.00	59.50
	Teleconference with J. Massey re follow-up to call with Brown Rudnick and	Otterbourg	re MTD and	PI.
04-07-2023	AS B140 - Relief from Stay / Adequate Protection Proceedings	2.30	595.00	1,368.50
	Legal research re mandate rule.			
04-07-2023	AS B140 - Relief from Stay / Adequate Protection Proceedings	0.10	595.00	59.50
	Email R. Morse and K. Bjorklund re case status and strategy.			
04-07-2023	RSM B190 - Other Contested Matters (excluding assumption / rejection motions)	0.20	860.00	172.00
	Correspondence with colleagues re potential legal arguments in support of	motion to di	smiss.	
04-08-2023	JSM B110 - Case Administration	0.60	1,160.00	696.00
	Review draft information brief.			
04-08-2023	JSM B190 - Other Contested Matters (excluding assumption / rejection motions)	4.90	1,160.00	5,684.00

Date	Professional Task Exhibit G Page 4 of 8	Hours	Rate	Amount
	Drafting Ad Hoc committee motion to dismiss.			
04-08-2023	RSM B110 - Case Administration	0.20	860.00	172.00
	Reviewed client comments on draft AHC statement.			
04-08-2023	RSM B190 - Other Contested Matters (excluding assumption / rejection motions)	0.20	860.00	172.00
	Analyzed outline of arguments for motion to dismiss.			
04-08-2023	RSM B190 - Other Contested Matters (excluding assumption / rejection motions)	0.20	860.00	172.00
	Reviewed K. Bjorklund research re debtor's pre-filing duties to maxim	nize value.		
04-08-2023	RSM B190 - Other Contested Matters (excluding assumption / rejection motions)	0.10	860.00	86.00
	Correspondence with K. Bjorklund re further research avenues re del	btor's pre-filing dut	ies to maxin	nize value.
04-08-2023	RSM B190 - Other Contested Matters (excluding assumption / rejection motions)	0.10	860.00	86.00
	Correspondence with J. Massey re potential factual arguments relate	ed to frustration of p	ourpose	
04-08-2023	RSM B190 - Other Contested Matters (excluding assumption / rejection motions)	0.20	860.00	172.00
	Reviewed legal analysis of LTL's frustration of purpose argument.			
04-08-2023	JSM B110 - Case Administration	0.30	1,160.00	348.00
	Email communication with counsel to Ad Hoc committee regarding le	gal strategy.		
04-08-2023	KB B190 - Other Contested Matters (excluding assumption / rejection motions)	3.20	500.00	1,600.00
	Research whether fraudulent transfers may be unwound or nullified a transfer litigation constitutes a failure of a debtor's duty to maximize to	he value of the ba	nkruptcy est	ate.
04-09-2023	JSM B110 - Case Administration	0.40	1,160.00	464.00
	Email communication with counsel to Ad Hoc committee regarding le			
04-09-2023	JSM B190 - Other Contested Matters (excluding assumption / rejection motions)	7.30	1,160.00	8,468.00
	Drafting Ad Hoc committee motion to dismiss.			
04-09-2023	JSM B110 - Case Administration	0.40	1,160.00	464.00
	Review draft information brief.			
04-09-2023	JSM B195 - Non-Working Travel	3.20	580.00	1,856.00
	Travel to Trenton for first-day hearing. [BILLED AT 50% OF RATE]			
04-09-2023	AS B140 - Relief from Stay / Adequate Protection Proceedings	0.20	595.00	119.00
	Review draft motion to dismiss.	2.22	4 400 00	0.40.00
04-10-2023	JSM B110 - Case Administration	0.30	1,160.00	348.00
04.40.0000	Review draft information brief.	0.00	4 400 00	0.40.00
04-10-2023	JSM B110 - Case Administration	0.30	1,160.00	348.00
04-10-2023	Review PHV motion for new bankruptcy case.  JSM B190 - Other Contested Matters (excluding	2.80	1,160.00	3,248.00
	assumption / rejection motions)			
04-10-2023	Revising draft motion to dismiss second LTL bankruptcy petition.  RA B110 - Case Administration	0.80	320.00	256.00
J4-10-2023	Draft Pro Hac Vice applications for J. Massey and R. Morse.	0.60	320.00	250.00
04-10-2023	JSM B110 - Case Administration	1.00	1,160.00	1,160.00
J4-10-2023	Zoom with representatives on Ad Hoc committee to discuss legal stra		1,100.00	1,100.00
04-10-2023	JSM B140 - Relief from Stay / Adequate Protection Proceedings	4.70	1,160.00	5,452.00
	Drafting legal arguments to oppose LTL motion for stay relief.			
04-10-2023	JSM B110 - Case Administration	0.40	1,160.00	464.00
	Email communication with counsel to Ad Hoc committee regarding le		.,	10 1.00
04-10-2023	RSM B110 - Case Administration	0.80	860.00	688.00
		0.00	555.00	555.55

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Date	Professional Task Exhibit G Page 5 of 8	Hours	Rate	Amount
04-10-2023	RSM B110 - Case Administration	0.10	860.00	86.00
	Reviewed LTL's filing in response to MRHFM objection.			
04-10-2023	RSM B110 - Case Administration	0.10	860.00	86.00
	Reviewed draft Omnibus Objection to Debtor's First Day Relief.			
04-10-2023	RSM B110 - Case Administration	0.10	860.00	86.00
	Reviewed Kazan McClain opposition to Debtor's motion for order authorizing fil	ing list o	-	
04-10-2023	RSM B110 - Case Administration	0.60	860.00	516.00
	Reviewed draft informational brief of the ad hoc Committee re LTL second bank	ruptcy f	iling.	
04-10-2023	RSM B190 - Other Contested Matters (excluding assumption / rejection motions)	0.30	860.00	258.00
	Correspondence with J. Massey re avenues for gathering factual support for me	otion to	dismiss.	
04-10-2023	RSM B110 - Case Administration	0.20	860.00	172.00
	Revised motion for admission pro hac vice.			
04-10-2023	RSM B110 - Case Administration	0.20	860.00	172.00
	Correspondence with local counsel re motions for admission pro hac vice.			
04-10-2023	RSM B140 - Relief from Stay / Adequate Protection Proceedings	0.30	860.00	258.00
	Correspondence with J. Massey re preliminary injunction opposition.			
04-11-2023	RSM B110 - Case Administration	2.40	860.00	2,064.00
	Attended remotely portions of first day hearing of new LTL bankruptcy.			
04-11-2023	JSM B110 - Case Administration	7.40	1,160.00	8,584.00
	Attend first-day hearing in LTL 2.0.			
04-11-2023	JSM B195 - Non-Working Travel	4.50	580.00	2,610.00
	Travel for first-day hearing in LTL 2.0. [BILLED AT 50% OF RATE]			
04-11-2023	JSM B110 - Case Administration	0.60	1,160.00	696.00
	Email communication with Ad Hoc counsel regarding legal strategy.			
04-12-2023	JSM B110 - Case Administration	0.60	1,160.00	696.00
	Email communication with Ad Hoc counsel regarding legal strategy.			
04-12-2023	JSM B140 - Relief from Stay / Adequate Protection Proceedings	5.30	1,160.00	6,148.00
	Revising preliminary injunction stay relief opposition brief.			
04-12-2023	JSM B110 - Case Administration	0.50	1,160.00	580.00
	Further email communication with Ad Hoc counsel regarding legal strategy.			
04-12-2023	JGM B180 - Avoidance Action Analysis	0.20	800.00	160.00
	Communicate with R. Morse re avoidance action research.			
04-12-2023	JGM B180 - Avoidance Action Analysis	5.80	800.00	4,640.00
	Legal research re avoiding fraudulent transfers or unwinding mergers in bankru	ptcy.		
04-12-2023	RSM B190 - Other Contested Matters (excluding assumption / rejection motions)	0.40	860.00	344.00
	Correspondence with colleagues re legal research re responding to Debtor's ar	gument	re solvency.	
04-12-2023	RSM B190 - Other Contested Matters (excluding assumption / rejection motions)	0.70	860.00	602.00
	Analyzed legal arguments for unwinding funding agreement surrender.			
04-12-2023	RSM B190 - Other Contested Matters (excluding assumption / rejection motions)	0.20	860.00	172.00
	Conference with J. Mallory re legal research and analysis re responding to Defunding agreement.	btor's a	rgument re	surrender of
04-12-2023	RSM B190 - Other Contested Matters (excluding assumption / rejection motions)	0.90	860.00	774.00
	Conference with co-counsel re strategy for motion to dismiss and injunctive reli	ef motio	n.	
04-12-2023	RSM B140 - Relief from Stay / Adequate Protection Proceedings	0.30	860.00	258.00
	Correspondence with co-counsel re meet and confer re discovery negotiations.			
04-12-2023	RSM B190 - Other Contested Matters (excluding assumption / rejection motions)	0.40	860.00	344.00

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	Correspondence with clients re potential arguments and strategies for motion t	o dismis	3.	
04-12-2023	RSM B140 - Relief from Stay / Adequate Protection Proceedings	0.80	860.00	688.00
	Participated in Zoom with clients and co-counsel re discovery strategy and plan	١.		
04-13-2023	RSM B140 - Relief from Stay / Adequate Protection Proceedings	0.40	860.00	344.00
	Correspondence with colleagues re work on preliminary injunction opposition by	rief.		
04-13-2023	RSM B140 - Relief from Stay / Adequate Protection Proceedings	0.80	860.00	688.00
	Zoom conference with clients and co-counsel re discovery disputes and strate			
04-13-2023	RSM B110 - Case Administration	0.10	860.00	86.00
04.40.0000	Reviewed M. Watts video message re J&J settlement plan.	0.00	000.00	050.00
04-13-2023	RSM B110 - Case Administration	0.30	860.00	258.00
04-13-2023	Communication with clients and co-counsel re issues re LTL proposed plan an RSM B140 - Relief from Stay / Adequate Protection Proceedings	0.30	860.00	258.00
	Revised draft opposition to preliminary injunction motion.			
04-13-2023	RSM B140 - Relief from Stay / Adequate Protection Proceedings	0.30	860.00	258.00
	Analyzed legal and factual arguments in support of preliminary injunction oppo	sition bri	ef.	
04-13-2023	MC B190 - Other Contested Matters (excluding assumption / rejection motions)	1.40	1,000.00	1,400.00
	Review draft of objection to motion to apply automatic stay to non-debtors at provide comments to Jonathan Massey.	nd for pr	eliminary inj	unction and
04-13-2023	JGM B190 - Other Contested Matters (excluding assumption / rejection motions)	4.30	800.00	3,440.00
	Revise draft preliminary injunction opposition.			
04-13-2023	JGM B190 - Other Contested Matters (excluding assumption / rejection motions)	0.40	800.00	320.00
	Communicate with team re insolvency and financial distress.			
04-13-2023	JSM B110 - Case Administration	0.50	1,160.00	580.00
04-13-2023	Further email communication with Ad Hoc counsel regarding legal strategy.  JSM B140 - Relief from Stay / Adequate Protection  Proceedings	3.60	1,160.00	4,176.00
	Revising draft motion to dismiss.			
04-13-2023	JSM B140 - Relief from Stay / Adequate Protection Proceedings	5.20	1,160.00	6,032.00
	Revising preliminary injunction stay relief opposition brief.			
04-13-2023	JSM B140 - Relief from Stay / Adequate Protection Proceedings	0.90	1,160.00	1,044.00
	Zoom with outside counsel to Ad Hoc committee to discuss discovery strategy.			
04-13-2023	JSM B140 - Relief from Stay / Adequate Protection Proceedings	0.70	1,160.00	812.00
	Reviewing fraudulent conveyance research to include in preliminary injunction			
04-13-2023	JSM B110 - Case Administration  Email communication with Ad Hoc counsel regarding legal strategy.	0.60	1,160.00	696.00
04-14-2023	JSM B110 - Case Administration  Email communication with Ad Hoc counsel regarding legal strategy.	0.60	1,160.00	696.00
04-14-2023	JSM B140 - Relief from Stay / Adequate Protection Proceedings	3.40	1,160.00	3,944.00
04-14-2023	Revising preliminary injunction opposition.  JSM B140 - Relief from Stay / Adequate Protection Proceedings	3.20	1,160.00	3,712.00
	Revising draft motion to dismiss.			
04-14-2023	JSM B110 - Case Administration Litigation strategy zoom with Ad Hoc committee.	0.80	1,160.00	928.00

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Date	Professional	Task Exhibit G Page 7 of 8	Hours	Rate	Amount
04-14-2023	JSM	B110 - Case Administration	0.50	1,160.00	580.00
	Further email communication with Ad Hoc counsel regarding legal strategy.				
04-14-2023	JGM	B190 - Other Contested Matters (excluding assumption / rejection motions)	2.60	800.00	2,080.00
	Revise draft preli	minary injunction opposition.			
04-14-2023	JGM	B190 - Other Contested Matters (excluding assumption / rejection motions)	3.30	800.00	2,640.00
	Review new docu	iments from LTL.			
04-14-2023	RA	B110 - Case Administration	0.60	320.00	192.00
	Review documen	tation received from co-counsel.			
04-14-2023	MC	B190 - Other Contested Matters (excluding assumption / rejection motions)	1.20	1,000.00	1,200.00
	Review documen	ts in debtor's production.			
04-14-2023	RSM	B140 - Relief from Stay / Adequate Protection Proceedings	0.50	860.00	430.00
	Zoom conference	with clients and co-counsel re Debtor's proposed agreeme	nt re prelim	ninary injunc	tion scope.
04-14-2023	RSM	B140 - Relief from Stay / Adequate Protection Proceedings	1.60	860.00	1,376.00
	Revised draft opp	oosition brief re preliminary injunction relief.			
04-14-2023	RSM	B140 - Relief from Stay / Adequate Protection Proceedings	0.80	860.00	688.00
	Confer with collect relief.	agues re analyzing facts to support motion to dismiss and	opposition t	to preliminar	y injunction
04-14-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	1.20	860.00	1,032.00
	Analyzed Debtor'	s documents for purposes of developing factual support for	motion to d	dismiss.	
04-14-2023	RSM	B140 - Relief from Stay / Adequate Protection Proceedings	2.70	860.00	2,322.00
	Attended portion injunction relief.	of Haas deposition for purposes of developing factual re-	cord for op	pposition to	preliminary
04-14-2023	RSM	B110 - Case Administration	0.50	860.00	430.00
	Attended Court c	onference re protective order issues.			
04-14-2023	RSM	B140 - Relief from Stay / Adequate Protection Proceedings	2.80	860.00	2,408.00
	Attended portion injunction relief.	of Kim deposition for purposes of developing factual re	cord for op	oposition to	preliminary
			Total		145,755.50

# **Time Summary**

Professional	Hours	Amount
Anne Swift	5.30	3,153.50
Christopher Walling	2.00	1,000.00
Jeremy Mallory	16.60	13,280.00
Jonathan Massey	89.90	99,818.00
Kate Bjorklund	3.70	1,850.00
Matthew Collette	2.60	2,600.00
Rachel Morse	27.30	23,478.00
Rob Aguirre	1.80	576.00
-	Total	145,755.50

## **Expenses**

Expense	Description	Amount
E110 - Out of town travel	JSM - Two nights of lodging in Princeton for 4/11 hearing in Trenton.	369.10
E110 - Out of town travel	JSM - Rental car and parking to attend 4/11 hearing in Trenton.	102.46

Case 23-12825-MBK Doc 1341-8 Filed 09/08/23 Entered 09/08/23 16:17:11 Desc Expense Description Exhibit G Page 8 of 8 Amount

Total Expenses 471.56

Total for this Invoice 146,227.06